

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Michael Andrews

Write the full name of each plaintiff.

-against-

the City of New York, HRA

Theresa green, Baheem walter

Baheem Ronisha Morris, Robert

Ocean, Deon Cordon

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

19 cv 05622 (VEC)

(Include case number if one has been assigned)

**Amended
COMPLAINT**

Do you want a jury trial?

Yes No

SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: <u>1-23-20</u>

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question**
- Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Attacking me, making false statements on documentation Having me illegally incarcerated for 6 Days

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, theresa green, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____.

If the defendant is a corporation:

The defendant, City of New York, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Micahel

First Name

D

Middle Initial

Andrews

Last Name

3569 Dekalb Av 2D

Street Address

Wyc

County, City

NY

State

10467

Zip Code

347-6962-9751

Telephone Number

mike3336033@gmail.com

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Ronish A Morris
First Name Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City **State** **Zip Code**

Defendant 2: Rahleen Waller
First Name Last Name

First Name **Last Name**

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City **State** **Zip Code**

Defendant 3: Robert Ocean

First Name **Last Name**

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City **State** **Zip Code**

Defendant 4:

Aneesa green

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: 2322 3rd Avenue New York, 10035

Date(s) of occurrence:

September 21, 2017

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Please look over attached (6) Pages
all facts are numbered all individuals
are listed

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I was assaulted with a metal baton
Jumped by 4 individuals punched, hit in the
Back ~~in~~ with a metal baton taken to the ER
in handcuffs illegally incarcerated. Emotional
distress. Rikers Island

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Unspecified damages. Teresa green to
be charged with a crime for hitting me
with a metal baton after I called 911
and hitting on my Back

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I was leaving ~~East~~ 2322 3rd Av
 on September 21, 2017. I got off the elevator I noticed Teresa green screaming on the phone, so I was walking slow then waited into she^{was} walk out. ~~because~~
~~she was really was trying to do~~
~~I~~ was a few feet be Behind her But as I moved to the left she moved so I ~~walk~~ waited then I was walking out the door ~~but~~ ~~so~~ ~~so~~ I put on my headphones headphones and walking out. So She was still in the door way. I literally stepped on the back of her foot ^{I didnt know she was there in the doorway} She ① She started to punch me
About 4 or five times I was blocking her hits ~~telling~~ her I was sorry.
 + ② then She proceeded to take a metal Baton and hit me. ③ I grabbed it and threw it twice.

Then the third time I grabbed the metal Baton it look like she was trying to get something off of her Security belt that looked like a gun or a teaser, tayser, then a dark skin Security guy grabbed her and pulled her inside. I called 911. they told me to run so I did then the 911 operator asked me what was the exact address so they told me to go the front of the building and see what the address was, there was no numbers on the front So I open the other door ^{not} from the back ~~exit~~ exit. that way literally a ~~block~~ block and a half away But the front door ③ then ~~there~~ there a green came agian and started to swinging the metal Baton I grabbed it ~~again~~ again and threw it.

At this point I had no choice
But to fight her back because she
already hit me ³ about 6 times
with the metal baton ⁴ next thing
one security guard started to
punching me ⁵ two other guards
started punching ⁶ the big guy come
and started to punch me. ~~so~~ so two
was the height of 5'9 the other guard
was maybe my height and the big guy
had to be like 6'7. ⁷ then teresa
greer started hitting me again this
time in my back. at this time
I was all the way out the
building and I hear a lady and guy
saying oh my god why are all you
attacking ^{him} like ~~so~~ that so I moved
to ~~the~~ streets waiting for offices
to arrive and DHS. Dennis Doby were
told all of them the ones that ~~were~~
hitting me.

If you go on the Street and hit him one more time im going to arrest you guys Because you are attacking him and you guys can't hit him like that. So NYPD came ~~out~~ on the scene. Six Cops car that come ~~(8)~~ Several NYPD officers came and went or said to look at the ~~video~~ Video and each one told me to stay still and stay calm and wait. ~~(8)~~ Then a African American cop mate came on the ~~Scene~~ 25-35 Said he was a Sergeant ask what I wanted to do he told me to just go home. I Said I need to go to the ER. So he said call a Bus for me then looked at about four officers and told him to put handcuffs on me and each one officer Said no because ^{me} I didn't do anything. And the attacked me. ~~(8)~~ so he had to call officer ~~the~~ Charles to meet us at the hospital because the officers on ~~the~~ scene ~~don't~~ did not want to put me in ~~handcuffs~~

(10) for escorted me to the hospital in handcuffs for hours and she damage my hands with the metal Baton having in handcuffs like ~~I~~ was the ~~was~~ criminal. Emotional distress for all these things (11) for lying on the documentation because I specifically remember the ~~doctors~~ doctors telling Officer Charles ~~#~~ numerous times that the I was attacked I better not be arrested for being ~~an~~ attacked.

(12) for issue me a desk appearance ticket that I wasn't in knowledge of which caused me to be locked up in 2019 Rikers Island.

(13) for Emotional distress, excruciating back pain ~~at~~ my wrist and all other parts that I was hit with metal baton the four officers security FTC guards that was attacking me Teresa green and any other false witness that caused me to be locked up

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⑥

I'm looking to sue all individuals
 that physically attacked me and and
 Security officer or DHS officer that
 made false statements to cause me
 to get locked up for 6 Days.

- ① HRA officer theresa green
- ② Security officer that attacked me
 Dont know names But 2 ~~guys~~ guys
 was 5'9 one was ~~my~~ my height
 and one was about 6'7

Ronisha Morris

Raheen Walter

Robert Ocean

Deon Cordon

and the NYPD officer that called
 Officer Charles on the scene.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

1/23/20

Dated

Michael

D

First Name

Middle Initial

3569 DeKalb Av

Street Address

Wyc

County, City

WY

10467

State

Zip Code

347-682-9751

Telephone Number

MIKE33390d3a@gmail.com

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

19CV 05622

Andrews had michael
Name (Last, First, MI)

1

3569 Dekalb Av 3D	NY	10467	
Address	City	State	Zip Code
347 682-9751	Mike33390034@gmail.com		
Telephone Number	E-mail Address		

1/23/20

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)

~~500 Pearl Street~~

New York, NY 10007